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Filing date: **07/24/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92058897
Party	Plaintiff Ascension Health Alliance
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Signature	/Jonathn E. Moskin/
Date	07/24/2014
Attachments	MOTION ON CONSENT TO EXTEND TIME TO CONDUCT DISCOVERY CONFERENCE.pdf(751872 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Registration Nos. 3,595,725 and 3,608,718

Registered March 24, 2009

Mark: ASCENSION INSURANCE, INC.

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ASCENSION HEALTH ALLIANCE ,	:	
	:	
Petitioner,	:	Cancellation No. 92058897
	:	
– against –	:	
	:	
ASCENSION INSURANCE, INC.,	:	
	:	
Respondent.	:	
-----	X	

**MOTION ON CONSENT TO EXTEND TIME TO CONDUCT DISCOVERY
CONFERENCE**

Petitioner, Ascension Health Alliance, by its undersigned counsel, and with consent of counsel for Registrant, Ascension Insurance, Inc., hereby moves the Board to grant a three-week extension for the parties to conduct the discovery conference and requests that all subsequent dates be reset as set forth below:

Deadline for Discovery Conference :	08/22/2014
Discovery Opens :	08/22/2014
Initial Disclosures Due :	09/21/2014
Expert Disclosure Due :	01/19/2015
Discovery Closes :	02/18/2015
Plaintiff's Pretrial Disclosures :	04/04/2015
Plaintiff's 30-day Trial Period Ends :	05/19/2015
Defendant's Pretrial Disclosures :	06/03/2015

Defendant's 30-day Trial Period Ends : 07/18/2015

Plaintiff's Rebuttal Disclosures : 08/02/2015

Plaintiff's 15-day Rebuttal Period Ends : 09/01/2015

The extension is requested because the parties have been discussing both the possibility of settlement as well as the possible appropriateness of a district court action and resulting suspension of these proceedings. To avoid any unnecessary delay, Petitioner requests only a three-week extension rather than a 30-day extension contemplated under the TTAB rules and procedures.

Counsel for Respondent consented to this motion by email on July 24, 2014.

Dated: New York, New York
July 24, 2014

Respectfully submitted,

FOLEY & LARDNER LLP

By: /Jonathan E. Moskin/

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Attorneys for Petitioner
Ascension Health Alliance

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of July, 2014 a true and complete copy of the foregoing **MOTION ON CONSENT TO EXTEND TIME TO CONDUCT DISCOVERY CONFERENCE** was served by first-class mail on Registrant's counsel of record as follows:

Karin E. Sullivan, Esq.
Jeffrey Kass, Esq.
Ascension Insurance, Inc.
2345 Grand Blvd., Suite 610
Kansas City, MO 64108

/s/ Jonathan E. Moskin
Jonathan E. Moskin